

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA

v.

TERRANCE MOON,

Defendant.

CRIMINAL NO.: 11-cr-10223

VIOLATION:

COUNT 1: 21 U.S.C. § 841(a)

**Possession with Intent to Distribute
Controlled Substance (Heroin)**

COUNT 2: 21 U.S.C. § 841(a)

**Possession with Intent to Distribute
Controlled Substance (Cocaine)**

COUNT 3: 18 U.S.C. § 922(g)(1)

**Felon in Possession of a Firearm and
Ammunition**

COUNT 4: 18 U.S.C. § 924(c)(1)

**Possession of a Firearm in Furtherance of
Drug Trafficking Crime**

**18 U.S.C. § 853, 18 U.S.C. § 924(d), and 28
U.S.C. § 2461(c)
Criminal Forfeiture**

INDICTMENT

**COUNT ONE: 21 U.S.C. § 841(a) - Possession with Intent to Distribute Controlled
Substance (Heroin)**

The Grand Jury charges that:

On or about February 6, 2011, in Boston, in the District of Massachusetts,

TERRANCE MOON,

the defendant herein, knowingly and intentionally possessed with intent to distribute heroin, a
Schedule I controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1).

COUNT TWO: 21 U.S.C. § 841(a) - Possession with Intent to Distribute Controlled Substance (Cocaine)

The Grand Jury further charges that:

On or about February 6, 2011, in Boston, in the District of Massachusetts,

TERRANCE MOON,

the defendant herein, knowingly and intentionally possessed with intent to distribute cocaine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1).

COUNT THREE: 18 U.S.C. § 922(g)(1) - Felon in Possession of a Firearm and Ammunition

The Grand Jury further charges that:

On or about February 6, 2011, in Boston, in the District of Massachusetts,

TERRANCE MOON,

the defendant herein, having previously been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess in and affecting commerce a firearm and ammunition, to wit: one Sturm, Ruger & Co. model Service-Six, .357 caliber revolver, bearing serial number 160-59597 , and 6 rounds of Winchester .357 caliber ammunition.

All in violation of Title 18, United States Code, Section 922(g)(1).

COUNT FOUR: 18 U.S.C. § 924(c)(1) - Possession of a Firearm In Furtherance of Drug Trafficking Crime

The Grand Jury further charges that:

On or about February 6, 2011, in Boston, in the District of Massachusetts,

TERRANCE MOON,

the defendant herein, did knowingly possess a firearm, that is, a Sturm, Ruger & Co. Model Service-Six, .357 caliber revolver, bearing serial number 160-59597, in furtherance of the drug trafficking crimes in Counts One and Two.

All in violation of Title 18, United States Code, Section 924(c)(1).

FIRST FORFEITURE ALLEGATION (DRUGS)
(21 U.S.C. § 853)

The Grand Jury further charges that:

1. Upon conviction of one or more of the offenses alleged in Counts One and Two of this Indictment,

TERRANCE MOON,

defendant herein, shall forfeit to the United States any and all property constituting, or derived from, any proceeds the defendant obtained, directly or indirectly, as a result of such offenses; and/or any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such violations.

2. If any of the property described in paragraph 1 above, as a result of any act or omission of the defendant,

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (c) has been commingled with other property which cannot be subdivided without difficulty;

it is the intention of the United States, pursuant to 21 U.S.C. § 853(p), to seek forfeiture of any other property of the defendant up to the value of the property described in paragraph 1.

All in violation of 21 U.S.C. § 853.

SECOND FORFEITURE ALLEGATION (FIREARMS)

(18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c))

The Grand Jury further charges that:

1. Upon conviction of one or more of the offenses alleged in Counts Three and Four of this Indictment,

TERRANCE MOON,

defendant herein, shall forfeit to the United States all firearms and ammunition involved in the commission of the offense, including but not limited to the following:

(a) one Sturm, Ruger & Co. Model Service-Six, .357 caliber revolver, bearing serial number 160-59597, and 6 rounds of Winchester .357 caliber ammunition.

2. If any of the property described in paragraph 1 above, as a result of any act or omission of the defendant --

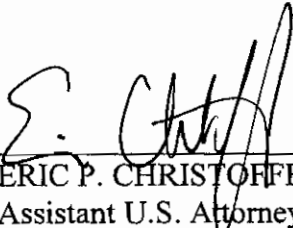
- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of this Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intention of the United States, pursuant to 21 U.S.C. § 853(p), as incorporated in 28 U.S.C. § 2461(c), to seek forfeiture of any other property of the defendant up to the value of the property described in paragraph 1.

All pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c).

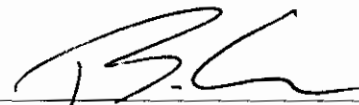
A TRUE BILL


FOREPERSON OF THE GRAND JURY


ERIC P. CHRISTOFFERSON
Assistant U.S. Attorney

DISTRICT OF MASSACHUSETTS; June 8, 2011.

Returned into the District Court by the Grand Jurors and filed.


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